

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: VC BATON ROUGE, LA, LLC
Debtor

CHAPTER 11
CASE NO. 18-04801-NPO

ANSWER AND RESPONSE TO MOTION TO CONVERT OR DISMISS

COMES NOW VC Baton Rouge, LA, LLC (the “Debtor”), and file this its *Answer and Response to Motion to Convert or Dismiss* (the “Motion”) [DK #52], filed by the United States Trustee (the “UST”) and, answering the allegations of the Motion paragraph by paragraph, as follows, to-wit:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Debtor admits the allegations, inferences and conclusions contained in Paragraph 5 of the Motion but denies that Debtor is a single asset real estate case.
6. Debtor denies the allegations, inferences and conclusions contained in Paragraph 6 of the Motion.
7. Admitted, in part. While the Debtor has no “direct” employees, it certainly has a number of indirect employees that are paid through related entities that perform work to the benefit of the Debtor.
8. Admitted. However, the Debtor is confident that it will find replacement tenants for its properties and has a significant amount of interest in that regard at the present time.
9. Admitted. However, the Debtor’s operations are being funded by a related entity that is using its own funds to support the Debtor’s operations at the current time.

10. The allegations, inferences and conclusions contained in Paragraph 10 of the Motion are denied.

11. Debtor admits the noted authority speaks for itself.

12. The allegations, inferences and conclusions contained in Paragraph 12 of the Motion are denied.

13. The allegations, inferences, conclusions and reservations contained in Paragraph 13 of the Motion are denied.

Last Unnumbered Paragraph

Debtor denies that the UST is entitled to the relief demanded within the Last Unnumbered Paragraph of the Motion or to other relief in the premises.

AFFIRMATIVE RESPONSES

1. The Debtor has substantial equity in its assets, along with significant litigation claims and causes of action to assert.

2. In addition, the Debtor has ample interest in prospective tenants in leasing its property to justify remaining in Chapter 11, at least for a brief period of time as discussed hereinafter.

3. The Debtor has resolved its issues that exist, in large part, with BankPlus, its major secured creditor. One of the agreements with BankPlus is that the Debtor will dismiss this bankruptcy case and Debtor anticipates doing that in the immediate future. As a result, the Court should continue the hearing scheduled for March 29, 2019, on the UST's Motion pending the result of the motion to dismiss.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof this Honorable Court will enter its order denying the Motion. Debtor prays for general relief.

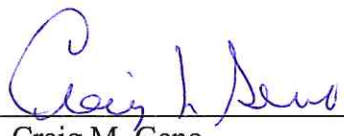
This the 21st day of March, 2019.

Respectfully submitted,

VC BATON ROUGE, LA, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via email transmission and/or electronic filing transmission, a true and correct copy of the above and foregoing pleading to the following:

Christopher J. Steiskal, Esq.
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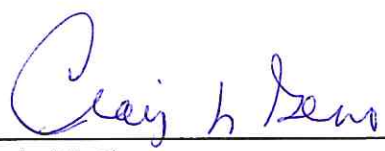
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THIS, the 21st of March, 2019.


Craig M. Geno